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10 META COMPANY

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 META COMPANY, a Delaware corporation,

15 Plaintiff,

16 v.

17 ZHANGYI ZHONG (a.k.a. Zhangyi “Johnny”  
18 Zhong, a.k.a. Zhangyi “Kevin” Zhong), an  
19 individual, DREAMWORLD USA INC., a  
20 Delaware corporation, and DOES 1 through

21 Defendants.

Case No. 3:17-cv-03259-EMC

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINES RE  
MOTION TO DISMISS**

1 Pursuant to Local Rule 6-2 of the Northern District of California, Defendants Zhangyi Zhong  
2 and Dreamworld USA Inc. (“Defendants”) and Plaintiff Meta Company (“Meta” or “Plaintiff”)  
3 hereby stipulate to move the hearing date and extend the briefing deadlines on Defendant’s Motion  
4 to Dismiss (“Motion to Dismiss”) (Dkt. No. 38).

5 WHEREAS, the Parties are currently attempting to informally resolve the above-captioned  
6 lawsuit and are set to begin those discussions on August 9, 2017 (Deol Decl., ¶ 2);

7 WHEREAS, the Parties wish to avoid spending additional time and effort in briefing and  
8 attending a hearing on the Motion to Dismiss in the event this case can be informally resolved (Deol  
9 Decl., ¶ 3);

10 WHEREAS the Motion to Dismiss is now set for hearing on August 31, 2017;

11 WHEREAS, Plaintiff’s opposition to the Motion to Dismiss is currently due on August 10,  
12 2017, only one day after the Parties are set to begin meeting in an attempt to informally resolve the  
13 above-captioned matter;

14 WHEREAS, Defendants’ reply in support of the Motion to Dismiss is currently due on  
15 August 17, 2017;

16 WHEREAS, on July 20, 2017 the Court granted an extension of the hearing dates and  
17 briefing schedule on the Motion to Dismiss in Dkt. No. 47 (Deol Decl., ¶ 4);

18 WHEREAS, counsel for both Parties agree that the requested extension would not affect any  
19 other deadlines in this case (Deol Decl., ¶ 5)

20 WHEREAS, counsel for both Parties agree that a further extension of the Motion to Dismiss  
21 hearing and briefing schedule would be prudent; and

22 WHEREAS, Civil Local Rule 6-2(a) of the Northern District of California states, “The  
23 parties may file a stipulation ... requesting an order changing time that would affect the date of an  
24 event or deadline already fixed by Court order, or that would accelerate or extend time frames set  
25 in the Local Rules or in the Federal Rules.”

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1 NOW, THEREFORE, in consideration of the foregoing, the Parties agree and hereby  
2 stipulate that:

- 3 (1) the hearing on the Motion to Dismiss be continued to September 14, 2017;  
4 (2) Plaintiff may file its opposition to the Motion to Dismiss by no later than August 24,  
5 2017;  
6 (3) Defendants may file their reply to the Motion by no later than August 31, 2017; and  
7 (4) Plaintiff shall maintain its right to amend its Complaint without leave of Court until  
8 August 24, 2017.

9 **IT IS SO STIPULATED.**

10  
11 Dated: July 31, 2017

Respectfully submitted,

12 /s/ Rick C. Chang

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Counsel for Meta Company

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~~[PROPOSED]~~ ORDER

**PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

Dated: 8/1/17

